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Dear Mr Trippier

Real Time Train Information: a consultation by ORR on the findings from its review

Passenger Focus provides the following comments in response to the questions ORR has posed in its consultation. We have done so keeping firmly in mind passengers' overriding requirement for accurate, timely and consistent information.

Question 2. Passenger Focus supports Network Rail's commitment to openness and transparency, including its decision to provide various feeds as 'open data'. In terms of whether it is a viable alternative to Darwin, it is important to note that Darwin exists in the first place because the raw data generated by Network Rail is not completely comprehensive. As we understand it, Darwin takes that raw data and enhances it with additional information not available in the Network Rail feed – for example, certain 'on the day' alterations to train schedules, cancellations etc. and the ability to give accurate arrival predictions even when a route is affected by, say, a temporary speed restriction. As a result, the information in Darwin is generally regarded as more accurate and richer than can be obtained from Network Rail direct. It is possible that, over time, developers will replicate elements of what Darwin does using the Network Rail information, but it is not clear to us how information input directly to Darwin by train companies or National Rail Enquiries could be captured by any such 'alternative Darwin'. Therefore **Passenger Focus believes the Network Rail feeds do not currently represent a viable alternative to Darwin.**

Question 4. Given that Darwin is generally regarded as the most accurate source of information that currently exists, it is desirable that Darwin be the data source for all passenger-facing real time information. We are concerned that the charge National Rail Enquiries makes for use of its data creates a disincentive for developers to build innovative products 'driven' by the most accurate data source. The idea that "largely accurate" is free (the Network Rail data), but that "comprehensively accurate" attracts a charge (the Darwin data) feels wrong and feels inconsistent with increasing passenger access to accurate, timely and consistent information.



There is an argument that if it is not possible to generate an income stream through Darwin Licences, train companies will reduce the funding available to National Rail Enquiries to develop and enhance Darwin in future. However, we are sceptical that this would happen in practice because National Rail Enquiries and the individual train companies need Darwin for their own purposes (for example to operate all National Rail Enquiries products and, by 2015, the customer information systems at all railway stations). It should be noted that Darwin is used to deliver certain outputs that are Regulated; in short, ceasing to develop it would not be a tenable position for the industry. In summary, **Passenger Focus believes that passengers' interests would be best served if Darwin information becomes available as an 'open data' feed.**

Yours sincerely

Guy Dangerfield
Passenger Issues Manager